

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**TONYA CLAY, et al.,**

**Plaintiffs,**

-vs-

**CUYAHOGA COUNTY, et al.,**

**Defendants.**

**Case No. 1:18 CV 2929**

**Judge Solomon Oliver, Jr.**

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**JOINT MOTION FOR EXTENSION  
OF TIME TO COMPLETE NEGOTIATIONS**

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Plaintiffs and the Cuyahoga County Defendants (the “Parties”) submit this Unopposed Motion for Extension of Time to complete negotiations. Per the County Defendants’ motion dated April 30, 2023, it was believed the Parties could reach an agreement and present it to County Council at its May 23, 2023, meeting. Additional time is needed to finalize the agreement, which is currently in draft form. The Parties have discussed a schedule to complete negotiations and believe they will need until June 15<sup>th</sup>, 2023, to complete negotiations, with a proposed date of June 20, 2023, to submit to County Council a proposed resolution for this case.

The Parties continue to cooperate in negotiations. Given the scope of this agreement, complexity of the subject matter, and changes in management structure at the County, the Parties need the requested extension. Accordingly, the Parties respectfully ask this Court to continue to hold this case in abeyance until after June 20, 2023, pending the Parties’ ongoing efforts towards finalizing a resolution to this case. The Parties will

jointly notify the Court of the status of the case on June 21, 2023, and whether a resolution has been reached.

Respectfully submitted,

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